

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CommScope, Inc., CommScope Inc. of) Civil Action No. 19-cv-15962-JXN
North Carolina, and CommScope) LDW
Technologies, LLC,)

Plaintiffs,)

v.)

NOTICE OF MOTION TO SEAL

Rosenberger Technology (Kunshan))
Co. Ltd., Rosenberger Asia Pacific)
Electronic Co., Ltd., Rosenberger)
Technology LLC, Rosenberger USA)
Corp., Rosenberger North America)
Pennsauken, Inc., Rosenberger Site)
Solutions, LLC, Rosenberger)
Hochfrequenztechnik GmbH & Co.)
KG, Northwest Instrument, Inc., and)
CellMax Technologies AB)

Defendants

I, Alicia Yu, hereby declare as follows:

1. I am in-house counsel for Rosenberger Technology (Kunshan) Co. Ltd., Rosenberger Asia Pacific Electronic Co., Ltd., and Rosenberger Technology LLC (collectively, “Rosenberger”) in the above-captioned matter.

2. I make this declaration in support of the Motion to Seal in accordance with Local Civil rules 5.3(c)(3) and 7.2 (the “Motion”) in connection with the parties’ Joint Dispute Letter and Updated Joint Dispute Letter submitted to the

Honorable Leda Dunn Wettre, and the exhibits thereto (“Exhibits”) (ECF Nos. 561 & 562).

3. The documents identified in the Consolidated Index submitted herewith should be maintained under seal on the Court’s docket because they contain confidential, proprietary and non-public information regarding Rosenberger business operations or that of their customers. Based upon my knowledge, public disclosure of this information could cause clearly defined, serious, and unnecessary harm to Rosenberger or their customers. Specifically, the redacted portions of the Joint Dispute Letter and Updated Joint Dispute Letter are narrowly tailored to statements that disclose information contained in discovery materials that have been designated Confidential or Attorneys’ Eyes Only by the propounding party, including the Exhibits. These statements concern confidential information about Rosenberger’s business operations, including confidential and commercially sensitive information about Rosenberger’s strategic business decisions and base station antenna design and development processes.

4. In addition to the limited redactions in the Joint Dispute Letter and Updated Joint Dispute Letter, Rosenberger request that the designated Exhibits remain under seal in their entirety. As detailed in the Consolidated Index, most of the Exhibits are discovery materials that have been designated Confidential or Attorneys’ Eyes Only by the propounding party. Moreover, the Exhibits contain

sensitive material that contains confidential and proprietary information pertaining to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes.

5. Plaintiffs do not oppose the sealing of the material identified in the Consolidated Index.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 1, 2023

DocuSigned by:
Alicia Yu
EA588A23859945E...

Alicia Yu